Per Sup 87-1373

T 70.10: 86-10

INDUSTRY CIRCULAR

DEPARTMENT OF
THE TREASURY
Bureau of Alcohol, Tobacco and Firearms
Washington, D. C. 20226
Number: 86-10 Date: 4-21-86

---PRODUCT ALERT II --- PRODUCT ALERT II --- PRODUCT ALERT II --

METHANOL CONTAMINATION IN ITALIAN WINES

TO: WHOLESALERS AND IMPORTERS OF WINE AND OTHERS CONCERNED:

This circular will provide the importers/wholesalers of Italian wines with the current procedures to follow for the testing and documentation of methanol in Italian wines which are currently in their inventories and those of their retail customers, in customs bonded warehouses (CBW) awaiting release, or in transit from Italy.

On April 17, 1986, Officials of the Bureau met with officials of the Italian government to discuss the current U.S. restrictions on the importation and sale of Italian wines. During the course of this meeting, ATF was given documented assurances by the Italian Government that no Italian wines bottled or shipped prior to December 12, 1985 had been contaminated by the addition of methanol by Italian producers or bottlers.

Based on these assurances, the following procedures have been initiated by ATF:

1. For Italian wines for which there is documentary evidence that they were bottled or shipped to the United States prior to December 12, 1985, ATF will leave the testing for methanol content of these wines up to the discretion of the individual wholesaler, importer, distributor and retailer. ATF will not require mandatory testing of these wines.

2. For Italian wines bottled or shipped on or after December 12, 1985, all importers and wholesalers are advised that they should not sell these wines until they have had each brand of wine and vintage, if applicable, in their inventories tested by a commercial laboratory and certified as having safe levels of methanol. In addition to individual wholesaler testing, it will also be acceptable, if laboratory analyses are provided to the importer/wholesaler by his foreign supplier. These

laboratory analyses must also cover specific brands of wines, and the testing must have been performed by an Italian laboratory certified by the Italian Ministry of Agriculture. In both cases, copies of all laboratory analyses must be forwarded by the importer/wholesaler to ATF in Washington, DC per the instructions in Industry Circular #86-9.

3. For Italian wines bottled or shipped on or after December 12, 1985, which are currently being held in a CBW pending testing for methanol content, Customs has agreed to allow for the taking of samples by the importer for testing in commercial laboratories. These wines will be released by Customs upon presentation to Customs of a laboratory analysis showing safe levels of methanol for each brand in the shipment.

4. For those Italian wines bottled and shipped to the U.S. on or after December 12, 1985 but shipped before April 3, 1986, currently in transit from Italy and which do not have a laboratory certificate, the importer of record can effectuate release of these wines from Customs custody by signing a "Conditional Release Certification". By signing this certificate the importer of record will agree to secure samples of each brand and type of Italian wine from the shipment and send these samples to the ATF National Laboratory for testing. All samples should be mailed to 1401 Research Boulevard Rockville, Maryland 20850. Upon notification by Customs that the level of methanol was found safe, the shipment may be released to the retail level.

5. For Italian wines exported to the U.S. on or after April 3, 1986, a certificate of analysis will be required by Customs before the shipment will be released. This certificate must cover every brand and type of wine in the shipment and be issued by an Italian testing laboratory certified by the Italian Ministry of Agriculture. Any shipment received by Customs which was shipped to the U.S. on or after April 3, 1986 containing Italian wines which is not accompanied by this certificate will be denied entry.

Inquiries: All inquiries concerning the content of this circular should be directed to ATF's Alcohol Import-Export Branch in Washington DC at (202) 535-6245.

Stephen E. Higgins
Director

Per Susp 87-1373

T 70.10:86-11

INDUSTRY CIRCULAR

DEPARTMENT OF
THE TREASURY
Bureau of Alcohol, Tobacco and Firearms
Washington, D. C. 20226

Number: 86-11 Date: June 30, 1986

POLYPROPYLENE LIQUOR BOTTLES

Proprietors of Distilled Spirits Plants, Importers, and Others Concerned:

PURPOSE. The purpose of this circular is to inform you of a forthcoming ATF Ruling concerning the approval of polypropylene containers to be used for packaging distilled spirits products. The ATF Ruling will read as follows:

The Bureau of Alcohol, Tobacco and Firearms has received inquiries regarding the suitability of containers made of polypropylene material as liquor bottles.

Section 5301(a) of Title 26, United States Code, authorizes the Secretary of the Treasury to regulate the kind of containers designed or intended for use in the sale of distilled spirits. Sections 19.11, 194.11, 250.11, and 251.11 of Title 27, Code of Federal Regulations, state the definition of a liquor bottle as:

> "A bottle made of glass or earthenware, or of other suitable material approved by the Food and Drug Administration, which has been designed or is intended for use as a container for distilled spirits for sale for beverage purposes and which has been determined by the Director to adequately protect the revenue."

The container in question consists of three component materials, and is designed in such a manner that the only component that comes in contact with distilled spirits is an outer lining made of polypropylene. Hydrogen peroxide may be used to sterilize the lining. Food and Drug Administration regulations provide for the use of polypropylene as a component of articles intended for use in contact with food, including alcoholic beverages, in 21 C.F.R. § 177.1520. Hydrogen peroxide is approved as a sterilizing agent for polypropylene food contact surfaces, including those for alcoholic beverages, under 21 C.F.R. § 178.1005. The other two components, a core made of ethylene-vinyl acetate-vinyl alcohol (EVAL) encased entirely within a layer of polypropylene-maleic anhydride adduct are authorized for use in food containers by 21 C.F.R. §§ 77.1360(a) and 175.300(b), respectively. Neither material comes into contact with alcoholic beverages within the container.

Test results indicate that a slight proof loss within the tolerances provided by 27 C.F.R. § 5.37 may occur. Such a proof loss has no negative impact on the revenue. Therefore, it is determined that the use of these polypropylene-lined containers as liquor bottles affords adequate protection to the excise tax revenue.

Since the containers made of polypropylene are not considered standard liquor bottles, the Bureau is requiring that anyone using the containers apply for approval of the containers as distinctive liquor bottles under 27 C.F.R. Part 19. The containers will also be required to be manufactured in approved standards of fill.

Held, containers made of polypropylene and other materials may be used as containers for distilled spirits provided:

(1) The polypropylene containers are in compliance with Food and Drug Administration regulations;

(2) Approval has been received for the containers as a distinctive liquor bottle; and

(3) The containers are manufactured in an approved standard of fill.

INQUIRIES. Inquiries concerning this circular should refer to its number and be addressed to the Associate Director, Compliance Operations, Bureau of Alcohol, Tobacco and Firearms, 1200 Pennsylvania Avenue, NW, Washington, DC 20226. Attention: Distilled Spirits and Tobacco Branch.

Stephen E. Higgins
Director

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T 70.10: 86-12

INDUSTRY CIRCULAR

DEPARTMENT OF THE TREASURY
Bureau of Alcohol, Tobacco and Firearms
Washington, D. C. 20226
Number: 86-12 **Date:** 8/25/86

Explosives Security

Explosives Licensees, Permittees and Others Concerned:

With the recent upsurge of terrorism in the world and particularly threats of terrorist activity in the United States, it is timely to again stress the importance of security for explosives.

Although we review security measures during our on-site inspections, it is really up to you, the industry, to continually minimize the opportunity for theft. We would hope that you emphasize to your employees the need for being "security conscious" all of the time and that you periodically review and test your procedures and controls. Aside from the potential liabilities resulting from negligence, I know that none of us want to feel that our action, or failure to act, made it easier for terrorists or criminals to obtain explosives.

As you know, we have toll free hotlines for your use in the event a theft or loss does occur. The more quickly a theft or loss is detected and reported the better we will be able to alert the law enforcement community and possibly stop a terrorist act. We also would like for you to be alert to suspicious purchasers or other occurrences that you believe would be of interest to us.

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W. T. Drake

Acting Director

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T 70.10: 86-13

INDUSTRY CIRCULAR

DEPARTMENT OF
THE TREASURY
Bureau of Alcohol, Tobacco and Firearms
Washington, D. C. 20226

Number: 86-13 **Date:** October 6, 1986

CERTIFICATES OF ANALYSIS DENOTING DIETHYLENE GLYCOL TESTING OF IMPORTED AUSTRIAN WINES

Importers and Others Concerned.

Purpose. The Bureau is issuing this circular to advise industry members of the acceptance of Austrian certificates of analysis denoting diethylene glycol (DEG) test results.

Background. In July 1985, information was received that Austrian wines had been found in Europe containing DEG. DEG, a chemical commonly used for industrial purposes, is not allowed as a direct food additive under Food and Drug laws. Therefore, DEG added to any food product (wine) is not authorized and any such imported food would be considered illegal and a hazard to health.

Thus armed with the health risk information supplied to us by FDA and the knowledge that DEG was not a permissible additive, we initiated a DEG testing program.

To ensure the safety of the American consumer, ATF, in cooperation with the United States Customs Service, placed an embargo on all Austrian wines entering the United States. This embargo entailed detention and testing of Austrian wines prior to release.

Since the discovery of DEG contaminated Austrian wines, the Austrian Government has instituted a strict new wine law. According to the new wine law, Austrian vintage wines can only be exported in bottles. Only government laboratories are entitled to issue export certificates. Wines that are bottled outside of Austria cannot be guaranteed by the Austrian Government. No Austrian certificate will be issued for these wines.

During the past few months, we have been holding technical discussions with the Austrian Government regarding analytical certification of Austrian wines imported into the United States. We have recently agreed to accept the Austrian Certificate of analysis depicting DEG test results. Therefore, we have requested and Customs has agreed to lift the embargo in place at this time and replace it with the following procedures:

> Release shipments of Austrian wines entering the United States accompanied by a certificate of analysis from one of the following Austrian Government laboratories indicating that the wine in question does not contain DEG:
>
> Landwirtschaftlich-Chemische Bundesanstalt with laboratories in Vienna and Eisenstadt
>
> Hoehere Bundeslehr - und Versuchsanstalt, Klosterneuburg
>
> Landwirtschaftlich-Chemische Landes-Versuchs-und Untersuchungsanstalt Graz
>
> Bundesanstalt fuer Lebensmitteluntersuchung und - forschung Wein

(more)

Bundesanstalt fuer Lebensmitteluntersuchung Linz

Bundesanstalt fuer Lebensmitteluntersuchung Graz

Bundesanstalt fuer Lebensmitteluntersuchung
Innsbruck

Detain shipments of all Austrian wines entering the United States without a certificate of analysis from one of the above mentioned Austrian Government laboratories and submit, at least, one sample of each brand to ATF's National Laboratory, 1401 Research Blvd., Rockville, Maryland 20850.

Inquiries. Inquiries concerning this circular should refer to its number and should be addressed to:

Chief, Alcohol Import-Export Branch
Bureau of Alcohol, Tobacco and Firearms
ATTN: Industry Circular
P.O. Box 385
Washington, DC 20226

Stephen E. Higgins
Director

Department of the Treasury
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T 70.10: 86-14

INDUSTRY CIRCULAR

DEPARTMENT OF
THE TREASURY
Bureau of Alcohol, Tobacco and Firearms
Washington, D. C. 20226
Number: 86-14 Date: 10/20/86

PROCEDURE FOR OBTAINING LABEL APPROVALS FOR IMPORTED LIQUEURS, CORDIALS, FLAVORED SPIRITS AND DISTILLED GINS

Importers and others concerned

Purpose. This circular announces the future publication of an ATF Procedure which will be published in the next Alcohol, Tobacco and Firearms Quarterly Bulletin. The procedure will read substantially as follows:

Section 1. PURPOSE

This procedure provides guidelines for obtaining Federal label approval for imported liqueurs, cordials, flavored spirits and distilled gins.

Section 2. BACKGROUND

Liqueurs, Cordials and Flavored Spirits

The Bureau has consistently held that importers of all imported liqueurs, cordials and flavored spirits must obtain a statement from the foreign producer listing all ingredients and must submit a minimum 750 ml sample for analysis prior to issuing certificates of label approval.

Section 5.33(g) of Title 27, Code of Federal Regulations reads as follows:

> (g) Contents of bottles. A complete and accurate statement of the contents of the bottles to which labels are to be or have been affixed shall be submitted, on request, to the Director or the regional director (compliance).

Distilled Gins

Section 5.22(c), Class 3, defines "gin" as a product obtained by original and continuous distillation from mash, or by redistillation of distilled spirits, or by mixing neutral spirits, with or over juniper berries and other aromatics, or with or over extracts derived from infusions, percolations, or maceration of such materials, and includes mixtures of gin and neutral spirits. It shall derive its main characteristic flavor from juniper berries and be bottled at not less than 80 proof. Gin produced exclusively by the original distillation or by redistillation may be further designated as "distilled".

In order to properly determine the class of an imported gin, the Bureau has always required that a statement of process be submitted prior to issuing label approvals for gins designated as "distilled" in accordance with 27 CFR 5.51(d). Section 5.51(d) reads as follows:

> (d) Statements of Process. Forms 1649 covering labels for gin bearing the word "distilled" as a part of the designation shall be accompanied by a statement prepared by the manufacturer, setting forth a step-by-step description of the manufacturing process.

The Bureau has determined that several reasonable alternatives exist as to obtaining certificates of label approval for imported liqueurs, cordials and gins.

Section 3. ACCEPTABLE PROCEDURES

Prior to issuing certificates of label approval, the Bureau will require one of the following pieces of documentation:

Liqueurs, Cordials and Flavored Spirits

1. A statement of ingredients from the manufacturer and a 750 ml sample; or

2. A statement from the manufacturer that the product to be imported is identically formulated for world-wide distribution, provided ATF has a list of the ingredients on record, and a 750 ml sample; or

3. A 750 ml sample, and a statement from the importer setting forth the specific contents of the product. Such statement must be supported by a laboratory analysis performed by a commercial laboratory as to the specific ingredients contained in the product, and should differentiate between natural and artificial ingredients, colors, flavors, etc.

Distilled Gins

1. A statement of process from the manufacturer specifying the step-by-step process by which the "Distilled Gin" is manufactured; or

2. A statement from the manufacturer that the product to be imported is identically formulated for world-wide distribution, provided ATF has a statement of process on record.

Section 4. LIMITATIONS

The Bureau reserves the right to require resubmission of the appropriate documentation and/or samples in situations where the Bureau has reason to believe the product has been changed, or when required by the Director.

Section 5. INQUIRIES

Inquiries concerning this circular should refer to its number and be addressed to the Associate Director (Compliance Operations), Bureau of Alcohol, Tobacco and Firearms, 1200 Pennsylvania Avenue, N.W., Washington, DC 20226.

Stephen E. Higgins
Director

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T 70.10: 86-15

INDUSTRY CIRCULAR

DEPARTMENT OF
THE TREASURY
Bureau of Alcohol, Tobacco and Firearms
Washington, D. C. 20226
Number: 86-15 Date: 12/4/86

ARMOR PIERCING AMMUNITION

Federal Firearms Licensees and others concerned:

On August 28, 1986, the President signed Public Law 99-408 (100 Stat. 920) which regulates the manufacture, importation and sale of armor piercing ammunition.

The Act amends chapter 44 of title 18, United States Code to define the term armor piercing ammunition as "a projectile or projectile core which may be used in a handgun and which is constructed entirely (excluding the presence of traces of other substances) from one or a combination of tungsten alloys, steel, iron, brass, bronze, beryllium copper, or depleted uranium. Such term does not include shotgun shot required by Federal or State environmental or game regulations for hunting purposes, a frangible projectile designed for target shooting, a projectile which the Secretary finds is primarily intended to be used for sporting purposes, or any other projectile or projectile core which the Secretary finds is intended to be used for industrial purposes, including a charge used in an oil and gas well perforating device."

Provisions of Public Law 99-408 provide that:

1. No person may manufacture or import armor piercing ammunition and no manufacturer or importer may sell or deliver such ammunition except:

   a. for the use of the United States or any department or agency thereof or any State or any department, agency or political sub-division thereof;

   b. for the purposes of exportation; or

   c. for the purposes of testing or experimentation as authorized by the Director.

2. Manufacturers and importers of armor piercing ammunition must be licensed by the Bureau. Such licenses have a fee of $1,000 per year.

3. Licensed importers and licensed manufacturers must mark all armor piercing projectiles and packages containing such projectiles for distribution.

4. The Director may, after notice and opportunity for hearing, revoke the license of a licensed dealer who willfully transfers armor piercing ammunition.

The Bureau is issuing temporary regulations which will be effective on the date of publication in the Federal Register, except for the licensing provisions which will be effective December 1, 1986.

Regulatory provisions will establish recordkeeping requirements for all armor piercing ammunition dispositions and procedures for approval to receive armor piercing ammunition for testing or experimentation. Regulations will establish the marking requirements for armor piercing projectiles and packages containing such projectiles.

Regulations promulgated under the Act will allow for armor piercing ammunition received and maintained by licensed dealers as business inventory prior to August 28, 1986, to be transferred to any department or agency of the United States or any State or political subdivision thereof if a record of such ammunition is maintained in the form and manner prescribed by regulation.

As required by the Act, the Director is hereunder furnishing each licensed dealer information defining projectiles considered armor piercing. Such information is not all-inclusive for the purposes of the prohibition on manufacture, importation, or sale or delivery by a manufacturer or importer of such ammunition or 18 U.S.C. 929 relating to criminal misuse of armor piercing ammunition.

List of Armor Piercing Ammunition

The following is an initial listing of projectiles considered armor piercing.

1. KTW ammunition, all calibers. (Identified by a green coating on the projectile).

2. ARCANE ammunition, all calibers. (Identified by a pointed bronze or brass projectile).

3. THV ammunition, all calibers. (Identified by a brass or bronze projectile and having a head stamp containing the letters SFM and THV).

4. Czechoslovakian manufactured 9mm Parabellum (Luger) ammunition having an iron or steel bullet core. (Identified by a cupro nickel jacket and a head stamp containing a triangle, star and dates of 49, 50, 51 or 52. This bullet is attracted to a magnet).

5. German manufactured 9mm Parabellum (Luger) ammunition having an iron or steel bullet core. (Original packaging is marked Pistolenpatronen 08 m.E. This bullet is attracted to a magnet).

6. MSC .25ACP caliber ammunition. (Identified by a hollow point bronze bullet).

7. Black Steel Armor Piercing Ammunition as produced by National Cartridge, Atlanta, Georgia.

8. Black Steel Metal Piercing Ammunition as produced by National Cartridge, Atlanta, Georgia.

9. 7.62mm NATO AP. (Identified by black coloring on the bullet tip. This ammunition is produced in various NATO countries. The U.S. military designation is M61 AP).

10. 7.62mm NATO SLAP. (Identified by a projectile having a plastic sabot around a hard penetrator. The penetrator protrudes above the sabot and is similar in appearance to a Remington accelerator cartridge).

Inquiries regarding this circular should refer to its number and be addressed to the Associate Director (Compliance Operations) Bureau of Alcohol, Tobacco and Firearms, P.O. Box 189, Washington, DC 20044-0189.

Stephen E. Higgins
Director

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T 70.10: 86-16

INDUSTRY CIRCULAR

DEPARTMENT OF
THE TREASURY
Bureau of Alcohol, Tobacco and Firearms
Washington, D. C. 20226

Number: 86-16 **Date:** December 23, 1986

Product Displays

Proprietors of Distilled Spirits Plants, Bonded Wine Cellars, Breweries, and Wholesalers/Importers of Distilled Spirits, Wine and Malt Beverages:

Purpose. This circular is issued to inform the above proprietors of the Bureau of Alcohol, Tobacco and Firearms' policy concerning product displays.

Background. Things of value supplied by industry members to retailers are prohibited, both by law (26 USC § 205 (b)(3)) and regulation (27 CFR § 6.41) under the Federal Alcohol Administration (FAA) Act, if the other elements of the statute can be established. Only those things of value specifically listed under Subpart D of 27 CFR Part 6, as exceptions, are allowable. However, there appears to be some confusion among industry members concerning those things of value which are prohibited by 27 CFR 6.41 and those which are allowable as exceptions under Subpart D, specifically those allowable as product displays under 27 CFR § 6.83.

According to 27 CFR § 6.83, product displays are "any wine racks, bins, barrels, casks, shelving, and the like from which distilled spirits, wine, or malt beverages are displayed and sold." The key words in this definition are "from which." All of the examples given are items on which products either rest or are stacked. Each of these items possess the capability of storing or containing products. Therefore, the fact that an item has the capability to hold or contain distilled spirits, wine or malt beverages is the major determining factor in our decision to allow an item as a "product display."

In addition, we take into consideration other factors such as the direct physical contact of the item with the product, the current per brand dollar limitation and the fact that the item bears conspicuous and substantial advertising matter.

Finally, the similarity which exists between the item and those acceptable product displays specified in 27 CFR § 6.83 is also considered. The phrase "and the like," which is contained in 27 CFR § 6.83, is interpreted to mean that those items most similar to "wine racks, bins, barrels, casks [or] shelving," are allowable as "product displays." On the other hand, those items which bear little or no physical or functional resemblance to those displays specified in 27 CFR § 6.83 are not allowable.

Some examples of items which are <u>not</u> allowable as "product displays" under 27 CFR § 6.83 are blenders, motorcycles, bicycles which contain baskets filled with products, televisions and videocassette recorders. These examples bear little, if any, physical or functional resemblance to those displays enumerated in 27 CFR § 6.83.

Also, the trade practice regulations which were revised and finalized in 1980 increased the dollar limitation set by 27 CFR § 6.83. The preamble to these regulations (T.D. ATF-74) specifically addressed the reason why the dollar limitation on product displays was increased. According to this preamble, the Bureau liberalized the dollar limitation to enable industry members to furnish better product displays (e.g. displays made of wood instead of cardboard). The Bureau did not intend for this liberalization to allow "items of obvious value such as boats, televisions, or the like," as stated in the preamble. Accordingly, product displays must possess both physical and functional resemblance to the examples specified in 27 CFR § 6.83.

Industry should note that 27 CFR § 6.81 prohibits an industry member from providing a "product display" to a retailer if the furnishing of the item is "conditioned on the purchase of distilled spirits, wine or malt beverages." Therefore, a determination as to whether an item qualifies as a "product display" is not necessary, if it is found that the item was provided conditionally on the purchase of the industry member's product.

In summary, product displays are allowable if they meet the requirements of 27 CFR § 6.83. Product displays must possess the capability of storing or containing distilled spirits, wine or malt beverages, as well as maintain direct physical contact with the product itself. Finally, those items which bear little or no physical or functional resemblance to those displays specified in 27 CFR § 6.83 are not allowable. Those displays which are not allowable will be considered a means to induce and could lead to tied-house violations under the FAA Act, if the other elements of exclusion and interstate or foreign commerce (similar state law must exist for malt beverage products) can be established.

Inquiries. Inquiries concerning this circular should refer to the circular number and be addressed to the Bureau of Alcohol, Tobacco and Firearms, 1200 Pennsylvania Avenue, NW, Washington DC 20226, ATTN: Tax and Trade Compliance Branch.

Stephen E. Higgins
Director

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